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Ultimate Fighting Championship and UFC*

12 **UNITED STATES DISTRICT COURT**
13 **DISTRICT OF NEVADA**

14
15 Cung Le, Nathan Quarry, Jon Fitch,
16 Brandon Vera, Luis Javier Vazquez,
17 and Kyle Kingsbury on behalf of
themselves and all others similarly
situated,

18 Plaintiffs,

19 v.

20 Zuffa, LLC, d/b/a Ultimate Fighting
21 Championship and UFC,

22 Defendant.
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Case No.: 2:15-cv-01045-RFB-(BNW)

**DECLARATION OF WILLIAM A.
ISAACSON IN SUPPORT OF
ZUFFA, LLC'S RENEWED
MOTION FOR SUMMARY
JUDGMENT**

1 I, William A. Isaacson, declare as follows:

2 1. I am a member in good standing of the bar of the District of Columbia. I am
3 admitted *pro hac vice* to practice before this Court. I am a Partner in the law firm Paul, Weiss,
4 Rifkind, Wharton & Garrison LLP, counsel for Zuffa, LLC (“Zuffa”), in the above-captioned
5 action in the U.S. District Court for the District of Nevada, *Le et al. v. Zuffa, LLC*, No. 2:15-cv-
6 01045-RFB-(BNW).

7 2. I make this declaration in support of Zuffa’s Reply in Support of its Renewed
8 Motion for Summary Judgment (“Reply”). Based on my review of the files, records, and
9 communications in this case, I have personal knowledge of the facts set forth in this Declaration
10 and, if called to testify, could and would testify competently to those facts under oath.

11 3. Certain documents attached as exhibits to this Declaration as exhibits have red
12 boxes or yellow highlighting added to them to indicate text cited in the Motion. Except for those
13 red boxes and yellow highlighting, the attached documents are, as indicated below, true and
14 correct copies of the documents cited in the Reply.

15 4. Exhibit 114 is a true and correct copy of the full text of each paragraph of
16 Plaintiffs’ Counterstatement of Facts (“CSF”) and Zuffa’s fulsome response to each. Exhibit 114
17 is provided for the Court’s convenience and Zuffa’s responses contained therein do not contain
18 argument not also reflected in Zuffa’s Reply.

19 5. Exhibit 115 to this Declaration is a true and correct copy of the portions of
20 paragraphs in Zuffa’s Concise Statement of Facts (“SUF”) to which Plaintiffs’ CSF do not
21 dispute. Exhibit 115 is provided for the Court’s convenience and nothing contained therein
22 contain argument not also reflected in Zuffa’s Reply.

23 6. Exhibit 116 to this Declaration is a true and correct copy of an excerpt of the
24 deposition of Lorenzo Fertitta, taken on March 23, 2017, which has been redacted to remove
25 personally identifiable information.

26 7. Exhibit 117 is a true and correct copy of a letter issued by the FTC, dated January
27 25, 2012 and available at
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1 [https://www.ftc.gov/sites/default/files/documents/closing_letters/zuffallc/explosion-](https://www.ftc.gov/sites/default/files/documents/closing_letters/zuffallc/explosion-entertainment-llc/120125zuffa.pdf)
2 [entertainment-llc/120125zuffa.pdf](https://www.ftc.gov/sites/default/files/documents/closing_letters/zuffallc/explosion-entertainment-llc/120125zuffa.pdf) and last downloaded on December 21, 2023.

3 8. Exhibit 118 to this Declaration is a true and correct copy of excerpts of the
4 deposition of Colin Neville of third party The Raine Group, taken on August 8, 2017.

5 9. Exhibit 119 to this Declaration is a true and correct copy of an excerpt of a
6 document produced in this litigation by third party The Raine Group bearing the Bates number
7 RAINE000019 on the first page of the document that is a presentation on Zuffa's Business in
8 Brazil, which has been redacted to remove personally identifiable information.

9 10. Exhibit 120 to this Declaration is a true and correct copy of excerpts of the
10 deposition of Professor Roger Blair, Ph.D., taken on December 8, 2017.

11 11. Exhibit 121 to this Declaration is a true and correct copy of excerpts of the
12 deposition of Dr. Hal J. Singer, Ph.D., taken on January 23, 2018.

13 12. Exhibit 122 to this Declaration is a true and correct copy of excerpts of the
14 30(b)(6) deposition of Ike Lawrence Epstein on the topic of acquisitions taken on December 2,
15 2016.

16 13. Exhibit 123 to this Declaration is a true and correct copy of excerpts of the
17 deposition of Michael Mersch, taken July 14, 2017.

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19 I declare under penalty of perjury under the laws of the United States of America that the
20 foregoing facts are true and correct. Executed this 22nd day of December, 2023, in Washington,
21 D.C.

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23 /s/ William A. Isaacson
24 William A. Isaacson
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